

VERIFIED FEC COMPLAINT

Office of General Counsel,
Federal Election Commission,
999 E Street, N.W.,
Washington, D.C. 20463

Complainant: Vipin Verma

Daytona Beach, FL 32114

This complaint is in regard to the following committee:
BEAVEN FOR CONGRESS – ID #: C00515106
P.O. BOX 350097
PALM COAST, FL 32135

MUR # 6574

The committee filed the first report, the April Quarterly on April 13th, 2012, and filed two subsequent amendments. In the committee's current summary page on FEC, it states:

Total Receipts: \$23,810
Total Disbursements: \$12,442
Beginning Cash: \$16,583
Latest Cash On Hand: \$27,951

It is inconceivable how the committee has more cash on hand than was taken in total receipts for the committee. In addition, the summary page states that the committee had beginning cash of \$16,583, but no reports have been filed disclosing the nature of the contributions, or itemizing any receipts or disbursements.

The first report filed is the April Quarterly. The latest amendment of the April Quarterly report directly contradicts the summary page. The committee claims that it had \$13,875.62 cash on hand at the beginning of the reporting period, instead of \$16,583 listed on the summary page. Besides listing the cash on hand in the current report, no additional disclosures have been made in regards to prior receipts and disbursements, with the proper itemization.

In the latest amendment of April Quarterly, the total disbursements for the reporting period are listed as \$9,734.38, and the cash on hand at the end of the reporting period is listed as \$27,951.24. But, in the summary page, the total disbursements are listed as \$12,442 for the election cycle and cash on hand of \$27,951. It is impossible for both numbers to be accurate.

In addition, page 6 of the latest amendment, Michael H. Kerr has contributed a total of \$3,000 for the primary, in violation of the maximum contribution of \$2,500 per election.

The discrepancies on the cash on hand, total receipts and disbursements, and the lack of disclosure and itemization of the required receipts and disbursements are in direct contravention of FEC laws. It is requested that the proper division follows up the committee to require full disclosure under the campaign finance laws, and audit the committee receipts and disbursements to ensure that accurate information is being reported.

Dated: April 27, 2012

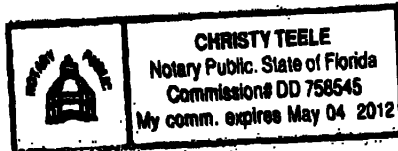
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Vipin Verma
Vipin Verma

STATE OF FLORIDA
COUNTY OF VOLUSIA

The foregoing instrument was sworn to and subscribed before me this 27th day of April, 2012 by
Vipin Verma.

(SEAL)



Christy Teele
NOTARY PUBLIC

Personally Known _____ OR Produced Identification ✓
Type of Identification Produced FL DL V6SD-860-86-469-0

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